



EXHIBIT 1

Confidential version filed under seal pursuant to California Public Utilities Code Section 585 and General Order 66-C.

FILED
7-05-16
04:59 PM

EXHIBIT 2

Anita Taff-Rice

From: THOMSON, MARGARET M (Legal) <mt4348@att.com>
Sent: Friday, April 29, 2016 4:21 PM
To: Michel Nelson; Anita Taff-Rice
Cc: MILLER, DAVID J (Legal)
Subject: RE: C.15-12-020 - O1 Communications v. AT&T Mobility - Summary of 2016.04.12 Meet and Confer
Attachments: ATTMOBILITY-000263 - re-issued 04-29-16.pdf; ATTMOBILITY-000372 - re-issued 04-29-16.pdf; ATTMOBILITY-000570 - re-issued 04-29-16.pdf

Dear Michel and Anita:

Below are AT&T Mobility's follow-up responses regarding O1's data requests discussed on our call on April 12, 2016. AT&T Mobility provides these responses subject to and without waiver of its previously made objections.

O1 Request 1-3

Counsel for AT&T Mobility will verify whether the agreement provided at the URL identified in its response is the agreement that is still in effect between Pacific Bell and AT&T Mobility.

AT&T Mobility Response: The agreement provided at the URL identified in AT&T Mobility's original response is the current version of the agreement in effect between Pacific Bell and AT&T Mobility.

Counsel for AT&T Mobility will verify the number of Traffic Exchange Agreements it has with non-ILECS in California and inform O1 whether producing all such TEAs is feasible.

AT&T Mobility Response: The requested agreements are not filed of record and are considered confidential by both AT&T Mobility and the other parties to the agreements. Before AT&T Mobility can produce the agreements in this dispute, AT&T Mobility must notify and obtain permission from the other parties.

AT&T Mobility has agreements applicable only to California with 12 non-ILECs. AT&T Mobility will request consent from the other signatories to produce those agreements pursuant to the NDA.

AT&T Mobility also has agreements applicable to California and multiple other states with 31 other non-ILECs. Given the large number of these agreements and the fact that AT&T Mobility is currently seeking consent to disclose the 12 California-specific agreements, AT&T Mobility does not plan at this time to seek permission to produce the 31 agreements that are operative in California and other states.

AT&T Mobility will amend its response to O1 Request 1-3.

O1 Request 1-4

Counsel for AT&T Mobility will confirm whether there are other agreements regarding voice traffic with other AT&T affiliates in California besides the ICA identified in its response.

AT&T Mobility Response: AT&T Mobility does not have any agreements regarding voice traffic with any AT&T affiliates in California besides the ICA identified in AT&T Mobility's original response to this request.

O1 Request 1-5

EXHIBIT 3

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

O1 Communications, Inc. (U 6065 C),

Complainant,

v.

New Cingular Wireless PCS, LLC (U 3060 C) and
AT&T Mobility Wireless Operations Holdings, Inc.
(U 3021 C),

Defendants.

C.15-12-020
(Filed December 28, 2015)

**RESPONSES OF
NEW CINGULAR WIRELESS PCS, LLC (U 3060 C) AND AT&T MOBILITY
WIRELESS OPERATIONS HOLDINGS, INC. (U 3021 C)
TO O1 COMMUNICATIONS' (U 6065 C)
SECOND SET OF DATA REQUESTS**

David J. Miller
Margaret M. Thomson
AT&T Services Legal Department
430 Bush Street, 1st Floor
San Francisco, CA 94108
Tel: (628) 444-7533
Fax: (415) 974-1990
margaret.m.thomson@att.com

June 7, 2016

V. SPECIFIC OBJECTIONS AND RESPONSES

REQUEST 2-1:

Please provide copies of the agreements with the parties identified in AT&T Mobility's response to O1's Data Request No. 2-1 as having direct connections with AT&T Mobility.

OBJECTIONS TO 2-1:

AT&T Mobility objects to this request on the grounds that the request is overly broad and unduly burdensome and that the information requested is (1) neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence, (2) confidential and proprietary to AT&T Mobility, and (3) confidential and proprietary to third parties. Without waiving these objections, AT&T Mobility will provide a response to this request.

RESPONSE TO 2-1:

Without waiving its objections, AT&T Mobility responds as follows: In addition to those agreements between AT&T Mobility and non-ILECs that are specific to California only that AT&T Mobility has already committed to producing to O1 after seeking consent from those other non-ILECs, AT&T Mobility will also seek consent from those Transit Carriers with whom AT&T Mobility has Traffic Exchange Agreements ("TEAs") to produce those TEAs in this proceeding and subject to further negotiation of the parties' Non-Disclosure Agreement and appropriate redaction.

EXHIBIT 4

Confidential version filed under seal pursuant to California Public Utilities Code Section 583 and General Order 66-C.

EXHIBIT 5

Confidential version filed under seal pursuant to California Public Utilities Code Section 583 and General Order 66-C.

EXHIBIT 6

Anita Taff-Rice

From: Anita Taff-Rice <anita@icommlaw.com>
Sent: Tuesday, June 28, 2016 9:41 AM
To: THOMSON, MARGARET M (Legal)
Cc: MILLER, DAVID J (Legal); 'Paul Walters'; Michel Nelson
Subject: C.15-12-020 AT&T Mobility outstanding items from meet and confer

Margaret,

I am providing a summary of outstanding items for AT&T Mobility from our meet and confer yesterday.

O1 DRs 1-1, 1-2, 2-1, 2-6: AT&T Mobility indicated that it intends to revise the list of carriers/VoIP providers with which it has direct connect agreements in California (DR 1-1, 1-2) and to produce an additional agreement today (DRs 2-1, 2-6). AT&T Mobility indicated that it does not intend to produce direct connect agreements for all of the entities listed on the existing or revised list. AT&T Mobility indicated that it is applying some criteria through which it decides to produce the agreements based on whether it believes the entity is "similar" to O1 and/or whether the agreement includes direct connects in California or California plus other states. AT&T Mobility agreed to provide an explanation of the criteria and process it is using to decide whether to produce or withhold agreements.

I want to reiterate my comments on the call. O1's data request 1-1/1-2 asked AT&T Mobility to identify all telecom carriers and VoIP providers that have an agreement for direct connects in California. O1's data request 2-1 sought copies of all of those agreements (i.e. all of the entities identified in response to DRs 1-1 and 1-2). O1 does not agree that it is proper for AT&T Mobility to pick and choose which agreements to produce. If the agreement allows for direct connection in California, it should be produced. If the agreement includes states other than California, AT&T Mobility may redact the non-California portion (as it has already done), but it may not withhold those agreements. Therefore, O1 expects AT&T Mobility to produce an agreement for each of the carriers or VoIP providers identified in response to DRs 1-1 and 1-2. To date, AT&T Mobility has produced only 10 agreements even though there are 21 carriers/VoIP providers listed in response to DR 1-1/1-2.

O1 DR 2-8: no response has been provided other than AT&T Mobility's statement that it is looking for documents that are not privileged

O1 DR 2-10: AT&T Mobility produced some documents, but it may be withholding others on the basis of privilege; O1 reiterated its request for a privilege log

O1 DRs 2-2, 2-8, 2-10, 2-24, 2-27, 2-29, 2-31, 2-45: AT&T Mobility indicated it is looking for documents and will produce any that are not privileged; O1 reiterated its request for a privilege log for any documents being withheld on the basis of privilege

In addition, I overlooked the following DR during our meet and confer yesterday.

O1 DR 27(e) and 29: O1 asked for documents, but AT&T Mobility provided only a narrative response. Please produce responsive documents.

Thanks, Anita

On 6/27/2016 3:15 PM, Anita Taff-Rice wrote:

Margaret,

When you provide the narrative response tomorrow explaining how AT&T Mobility is selecting documents to produce in response to DR 2-1, the email below regarding DR 1-3 may be helpful. You indicated that there are 12 TEAs with non-ILECs in California and that you were negotiating with those carriers to produce the agreements. Please include in your explanation why AT&T Mobility is producing only 11 agreements (10 already produced plus one tomorrow) rather than 12.

Thanks, Anita

From: THOMSON, MARGARET M (Legal) [<mailto:mt4348@att.com>]

Sent: Friday, April 29, 2016 6:21 PM

To: Michel Nelson; Anita Taff-Rice

Cc: MILLER, DAVID J (Legal)

Subject: RE: C.15-12-020 - O1 Communications v. AT&T Mobility - Summary of 2016.04.12 Meet and Confer

Dear Michel and Anita:

Below are AT&T Mobility's follow-up responses regarding O1's data requests discussed on our call on April 12, 2016. AT&T Mobility provides these responses subject to and without waiver of its previously made objections.

O1 Request 1-3

Counsel for AT&T Mobility will verify whether the agreement provided at the URL identified in its response is the agreement that is still in effect between Pacific Bell and AT&T Mobility.

AT&T Mobility Response: The agreement provided at the URL identified in AT&T Mobility's original response is the current version of the agreement in effect between Pacific Bell and AT&T Mobility.

Counsel for AT&T Mobility will verify the number of Traffic Exchange Agreements it has with non-ILECS in California and inform O1 whether producing all such TEAs is feasible.

AT&T Mobility Response: The requested agreements are not filed of record and are considered confidential by both AT&T Mobility and the other parties to the agreements. Before AT&T Mobility can produce the agreements in this dispute, AT&T Mobility must notify and obtain permission from the other parties.

AT&T Mobility has agreements applicable only to California with 12 non-ILECs. AT&T Mobility will request consent from the other signatories to produce those agreements pursuant to the NDA.

AT&T Mobility also has agreements applicable to California and multiple other states with 31 other non-ILECs. Given the large number of these agreements and the fact that AT&T Mobility is currently seeking consent to disclose the 12 California-specific agreements, AT&T Mobility does not plan at this time to seek permission to produce the 31 agreements that are operative in California and other states.

AT&T Mobility will amend its response to O1 Request 1-3.

O1 Request 1-4

Counsel for AT&T Mobility will confirm whether there are other agreements regarding voice traffic with other AT&T affiliates in California besides the ICA identified in its response.

AT&T Mobility Response: AT&T Mobility does not have any agreements regarding voice traffic with any AT&T affiliates in California besides the ICA identified in AT&T Mobility's original response to this request.

O1 Request 1-5

Pursuant to O1's clarification of this request, counsel for AT&T Mobility will verify whether there are documents relating to compensation received by AT&T Mobility for terminating AVOICS traffic.

AT&T Mobility Response: There are no documents relating to compensation received by AT&T Mobility for terminating AVOICS traffic.

ATTMOBILITY-000263, ATTMOBILITY-000372, and ATTMOBILITY-000570

The documents produced by AT&T Mobility, Bates labeled ATTMOBILITY000263, ATTMOBILITY000372, and ATTMOBILITY000570 were not redacted. The black boxes on those pages are the result of converting the original documents into PDFs. The text that is obscured are file names for the documents attached to emails. AT&T Mobility will see if it can produce new versions of those pages where the document names are not obscured.

AT&T Mobility Response: AT&T Mobility is producing new versions of the documents Bates labeled ATTMOBILITY-000263, ATTMOBILITY-000372, and ATTMOBILITY-000570, attached hereto.

Other Responsive Documents

Finally, counsel for AT&T Mobility will confirm whether there are any other responsive documents to O1's requests that have been identified since AT&T Mobility's first production.

AT&T Mobility Response: AT&T Mobility has not identified any other responsive documents to O1's requests since AT&T Mobility's first production.

Very truly yours,

Margaret

Margaret Thomson

Please note new phone number

**PRIVILEGED ATTORNEY CLIENT COMMUNICATION/CONFIDENTIAL
ATTORNEY WORK PRODUCT**

From: Anita Taff-Rice [<mailto:anita@icommlaw.com>]
Sent: Tuesday, April 26, 2016 5:52 PM
To: THOMSON, MARGARET M (Legal) <mt4348@att.com>; Michel Nelson
<mnelson@o1.com>
Cc: MILLER, DAVID J (Legal) <dm9282@att.com>
Subject: Re: C.15-12-020 - O1 Communications v. AT&T Mobility - Summary of 2016.04.12
Meet and Confer

Margaret,

Given the amount of time ATTM has been working on these action items, we are requesting that ATTM produce responses as soon as they are available rather than holding responses and producing all at once.

Thanks, Anita

On 4/26/2016 5:41 PM, THOMSON, MARGARET M (Legal) wrote:

Anita,

We will provide responses to the outstanding issues listed below for DRs 1-3 to 1-6 by the end of the week.

Thanks,

Margaret

Margaret Thomson

Please note new phone number

**PRIVILEGED ATTORNEY CLIENT
COMMUNICATION/CONFIDENTIAL ATTORNEY WORK PRODUCT**

From: Anita Taff-Rice [<mailto:anita@icommlaw.com>]
Sent: Tuesday, April 26, 2016 5:27 PM
To: THOMSON, MARGARET M (Legal) <mt4348@att.com>; Michel Nelson <mnelson@o1.com>
Cc: MILLER, DAVID J (Legal) <dm9282@att.com>
Subject: Re: C.15-12-020 - O1 Communications v. AT&T Mobility - Summary of 2016.04.12 Meet and Confer

Margaret,

I would appreciate a response regarding my inquiry as soon as possible.

Thanks, Anita

On 4/25/2016 11:16 AM, Anita Taff-Rice wrote:

Margaret,

I don't believe that O1 has received any responses to its DRs 1-3 to 1-6 listed below as action items for AT&T Mobility after our meet and confer. Would you please confirm that AT&T Mobility is working to provide responses and when they will be provided to O1?

Thanks, Anita

On 4/13/2016 10:22 AM, THOMSON, MARGARET M (Legal) wrote:

Michel and Anita,

Here is a summary of our Meet and Confer from yesterday afternoon. Please let us know whether anything is captured incorrectly, or if you have anything to add.

AT&T Mobility DR 1-1

While there is a “subset of O1 customers” that “only allow O1 to transmit and terminate their traffic if O1 can use direct connections to do so,” they are not called “Platinum Customers” as referenced by O1 at the TRO hearing. O1 does not have any name for this particular subset of customers.

AT&T Mobility DR 1-2

O1 does not have marketing materials directed at “Platinum Customers” or the subset of O1 customers that only allow O1 to transmit and terminate their traffic via direct interconnection.

O1 will amend its response to DR 1-2 to indicate that O1 does not have any marketing materials for its wholesale products outside of O1’s wholesale website, www.o1.com.

AT&T Mobility DR 1-3

O1 will not provide responses to subparts (a) and (b).

O1 will verify whether there are any responsive documents to subparts (c) and (d) which support O1's contention that a customer will not allow their traffic to be carried through Indirect Interconnection due to quality considerations, but the only such documents would be contracts with those customers. To the extent any such contracts exist, O1 will produce them but redact any information that identifies the customers or that O1 deems to be competitively sensitive or that O1 deems to be about services that are not "specifically related" to this dispute.

O1 will not provide responses to subparts (e) and (f).

AT&T Mobility DR 1-4

O1 will not provide responses to subparts (a), (b), (d), (e), (f), and (g).

O1 will verify whether there are any responsive documents to subpart (c) which support O1's contention that a customer will not allow their traffic to be carried through Indirect Interconnection due to quality considerations, but the only such documents would be contracts with those customers. To the extent any such contracts exist, O1 will produce them but redact any information that identifies the customers or that O1 deems to be competitively sensitive or that O1 deems to be about services that are not "specifically related" to this dispute.

AT&T Mobility DR 1-5

O1 will verify whether there are any responsive documents to AT&T DR 1-4(c) which asks for all documents that support O1's contention that a

customer “requires direct connection...due to quality considerations.” To the extent any such documents exist, which in this case would only be contracts with those customers, O1 will produce those documents but redact any information that identifies the customers or that O1 deems to be competitively sensitive or that O1 deems to be about services that are not “specifically related” to this dispute. O1 anticipates that there are agreements with customers who seek to limit “hops” under 47 C.F.R. § 64.2107 that are responsive to this request.

AT&T Mobility DR 1-6

O1 will provide AT&T Mobility with this response today, April 13, 2016.

AT&T Mobility DR 1-7

O1 will provide AT&T Mobility with responsive documents. O1 will let AT&T Mobility know when it intends to produce these documents today, April 13, 2016. O1 will also describe what information was used to calculate damages.

AT&T Mobility DR 1-8

O1 confirmed that it contends it has lost customers and revenue because it no longer has direct interconnection with AT&T Mobility.

O1 will not provide a response to DR 1-8.

AT&T Mobility DR 1-9

O1 will verify whether there are any agreements that it had with any customer that O1 contends it has lost because it no longer has direct interconnection with AT&T Mobility. To the extent any such documents exist, O1 will produce those documents but redact any information that identifies the customers or that O1 deems to be competitively sensitive or that O1 deems to be about services that are not “specifically related” to this dispute. O1 will let AT&T Mobility know whether such agreements exist today, April 13, 2016.

AT&T Mobility DR 1-11

O1 will amend its response to DR 1-11 to indicate that there are no other marketing materials regarding O1’s Transit Services and Termination Services outside of its wholesale website, www.o1.com.

AT&T Mobility DR 1-12

O1 will not produce a response to DR 1-12 subparts (b) and (c).

O1 will amend its response to DR 1-12(a) to indicate that there are no other marketing materials regarding O1’s provision of “local exchange and long distance voice services to retail customers in the State of California” outside of its retail service website, www.o1phone.com.

AT&T Mobility DR 1-13

O1 will amend its response to DR 1-13 to indicate that there are no other marketing materials regarding O1’s provision of “local exchange and long distance voice services to retail customers in

the State of California” outside of its retail service website, www.o1phone.com.

AT&T Mobility DR 1-14

O1 will not produce a response to DR 1-14.

AT&T Mobility DR 1-15

O1 will not produce a response to DR 1-15.

AT&T Mobility DR 1-16

O1 will not produce a response to DR 1-16.

AT&T Mobility DR 1-17

O1 will not produce a response to DR 1-17.

AT&T Mobility DR 1-18

O1 will not produce a response to DR 1-18.

O1 Request 1-3

Counsel for AT&T Mobility will verify whether the agreement provided at the URL identified in its response is the agreement that is still in effect between Pacific Bell and AT&T Mobility.

Counsel for AT&T Mobility will verify the number of Traffic Exchange Agreements it has with non-ILECS in California and inform O1 whether producing all such TEAs is feasible.

O1 Request 1-4

Counsel for AT&T Mobility will confirm whether there are other agreements regarding voice traffic with other AT&T affiliates in California besides the ICA identified in its response.

O1 Request 1-5

Pursuant to O1's clarification of this request, counsel for AT&T Mobility will verify whether there are documents relating to compensation received by AT&T Mobility for terminating AVOICS traffic.

O1 Request 1-6

The documents produced by AT&T Mobility, Bates labeled ATTMOBILITY000263, ATTMOBILITY000372, and ATTMOBILITY000570 were not redacted. The black boxes on those pages are the result of converting the original documents into PDFs. The text that is obscured are file names for the documents attached to emails. AT&T Mobility will see if it can produce new versions of those pages where the document names are not obscured.

O1 Request 1-7

As requested, here is the link provided by AT&T Mobility in its original response:

http://bitsavers.trailing-edge.com/pdf/westernElectric/telephony/books/Engineering_and_Operations_in_the_Bell_System_2ed_1984.pdf

Finally, counsel for AT&T Mobility will confirm whether there are any other responsive documents to O1's requests that have been identified since AT&T Mobility's first production.

Very truly yours,

Margaret

Margaret Thomson

**Executive Director - Senior Legal Counsel |
AT&T Services, Inc. - Legal**

Please note new address and phone number

430 Bush Street, First Floor

San Francisco, CA 94108

Tel 628.444.7533 | Fax 415.543.0418

mt4348@att.com

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*message, along with any attachments, from your
computer. Thank you.*

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EXHIBIT 7

Confidential version filed under seal pursuant to California Public Utilities Code Section 583 and General Order 66-C.

EXHIBIT 8

Anita Taff-Rice

From: Paul Walters <pwalters@sbcglobal.net>
Sent: Thursday, June 30, 2016 3:20 PM
To: anita@icommlaw.com
Cc: THOMSON, MARGARET M (Legal); MILLER, DAVID J (Legal); Michel Nelson
Subject: Re: Final request for meet and confer on direct connect agreements being withheld by AT&T

Anita: My client has asked me to respond to your email.

AT&T Mobility will not produce the Traffic Exchange Agreements for all entities identified on Bates 597 and 987. AT&T has explained the criteria for identifying the TEAs it has agreed to produce, and those criteria do not identically match the list of carriers produced pursuant to DR1-1.

Because of the burdensomeness of providing a list of all carriers with which AT&T Mobility has direct connections in all 50 states, AT&T Mobility produced a list of all carriers with which it currently has direct connection facilities in California. We provided an updated list to you earlier this week.

Because of the similar burdensomeness of producing TEAs for all 50 states, AT&T Mobility produced TEAs applicable only to California but not other states. In addition, though not requested by O1, AT&T Mobility produced copies of all TEAs with transit carriers like O1. This groups includes some transit carrier not listed in Bates 597 and 987. We made this additional production because we felt those transit carrier agreements were germane to this complaint, and that O1 would want to review them.

AT&T Mobility acknowledges that this email exchange constitutes the necessary "meet and confer" conference.

AT&T Mobility will not seek a continuance of testimony and/or hearing dates. However, AT&T Mobility will not object should O1 seek a continuance.

Paul Walters, Jr.
17 E. 1st St.
Edmond, OK 73034
405-359-1718 (Office)
405-388-4562 (Mobile)
pwalters@sbcglobal.net

From: Anita Taff-Rice <anita@icommlaw.com>
To: 'Paul Walters' <pwalters@sbcglobal.net>
Cc: "THOMSON, MARGARET M (Legal)" <mt4348@att.com>; "MILLER, DAVID J (Legal)" <dm9282@att.com>; Michel Nelson <mnelson@o1.com>
Sent: Thursday, June 30, 2016 4:51 PM
Subject: Final request for meet and confer on direct connect agreements being withheld by AT&T

Paul,

I just spoke with Margaret about production of the outstanding direct connection agreements and she indicated that you have been designated to provide a response on behalf of AT&T Mobility. Given that it is late in the day and testimony is due tomorrow, I would appreciate a response from you either confirming that AT&T Mobility will produce the agreements or that AT&T Mobility intends to withhold the agreements. As we discussed yesterday, and in my email this morning, O1 is requesting a meet and confer on this issue (either through these email exchanges or via telephone) as a precursor to a motion to compel. As stated in my email below and during our meet and confer yesterday, O1 is requesting copies of all agreements between AT&T Mobility and other carriers or VoIP providers that allow those entities to obtain direct connections in California from 2012 to the present regardless of whether the agreement is still in effect or whether the entity executing the agreement is still operational. This request is not limited only to the entities that AT&T Mobility confirmed has a direct connect agreement in response to DR 1-1 because O1 believes there are entities not listed that have a direct connection agreement.

Thanks, Anita

On 6/30/2016 12:38 PM, Anita Taff-Rice wrote:

Margaret,

Please confirm whether AT&T Mobility will be producing the agreements for all of the entities identified on Bates 597 and 987. Also, please confirm whether there are any agreements that allow carriers or VoIP providers to directly connect in California (regardless of whether the agreements also include areas outside of California) and whether AT&T will produce those agreements.

You're aware from my email this morning that O1's ability to prepare its opening testimony is substantially affected because we do not have all of the agreements in response to DR 2-1 and 2-2. If AT&T Mobility is unwilling to produce all agreements as requested, O1 will likely file a motion to compel or take other action. Given the short amount of time until testimony must be filed, please consider this email to be official notice of the need to meet and confer prior to filing a motion to compel. If you think a discussion would be useful, please let me know and I will attempt to schedule time this afternoon. Otherwise, please respond with AT&T Mobility's position on the production of direct connection agreements and an acknowledgement that we can treat this email exchange as our meet and confer.

Thanks, Anita

----- Forwarded Message -----

Subject:C.15-12-020 ("O1 Communications v. AT&T Mobility") -- AT&T Mobility's Amended Responses to O1's Second Set of Data Requests, served 06.30.16

Date:Thu, 30 Jun 2016 19:03:03 +0000

From:SELHORST, THOMAS (Legal) <ts1912@att.com>

To:mnelson@o1.com <mnelson@o1.com>, Anita@iCommLaw.com <Anita@iCommLaw.com>

CC:MILLER, DAVID J (Legal) <dm9282@att.com>, THOMSON, MARGARET M (Legal) <mt4348@att.com>

Please find attached an electronic copy (in PDF format) of **AT&T Mobility's Amended Responses to O1's Second Set of Data Requests in C.15-12-020**.

Please do not hesitate to contact me if you have difficulty opening the attached file.

Very truly,

Thomas Selhorst
AT&T Services, Inc.
2150 Webster Street, 8th Floor
Oakland, CA 94612
Tel.: 510-645-0645
Fax: 510-444-1842
E-Mail: thomas.selhorst@att.com

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iCommLaw
Anita Taff-Rice
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EXHIBIT 9

Confidential version filed under seal pursuant to California Public Utilities Code Section 583 and General Order 66-C.

EXHIBIT 10

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

O1 Communications, Inc. (U 6065 C),

Complainant

v.

New Cingular Wireless PCS, LLC (U 3060 C) and
AT&T Mobility Wireless Operations Holdings, Inc.
(U 3021 C),

Defendants.

C.15-12-020
(Filed December 28, 2015)

**RESPONSES OF
NEW CINGULAR WIRELESS PCS, LLC (U 3060 C) AND
AT&T MOBILITY WIRELESS OPERATIONS HOLDINGS, INC. (U 3021 C)
TO O1 COMMUNICATIONS' (U 6065 C)
FIRST SET OF DATA REQUESTS**

David J. Miller
Margaret M. Thomson
AT&T Services Legal Department
430 Bush Street, 1st Floor
San Francisco, CA 94108
Tel: (628) 444-7533
Fax: (415) 974-1990
margaret.m.thomson@att.com

March 8, 2016

contravention of the California Code of Civil Procedure or the Rules of Practice and Procedure of the Commission.

IV. OBJECTIONS TO INSTRUCTIONS

AT&T Mobility objects to the Data Request instructions to the extent they purport to require AT&T Mobility to produce information, data, documents or anything else in a manner not required by California law, and to the extent that they represent that AT&T Mobility must follow any procedure set forth in the instructions to preserve AT&T Mobility's objections and privileges, including but not limited the privilege log described in Instruction 11. The objections herein are not intended and should not be construed to waive AT&T Mobility's right to assert any applicable privilege or doctrine. AT&T Mobility objects to providing its responses under oath.

V. SPECIFIC OBJECTIONS

REQUEST 1-1:

Please provide a list of all telecommunication carriers with whom You have a direct connection or have had a direct connection with at any time since January 2012.

OBJECTIONS:

AT&T Mobility objects to this request on the grounds that the information requested (1) is overly broad and unduly burdensome, (2) is irrelevant to the instant dispute and (3) will not lead to the production of admissible evidence. Without waiving these objections, AT&T Mobility will provide a response to this request.

RESPONSE:

Without waiving its objections, AT&T Mobility responds as follows: AT&T Mobility will produce a list of telecommunications carriers with whom it currently has direct interconnection within the state of California – when AT&T Mobility and O1 reach agreement on an appropriate Non-Disclosure Agreement. The list will not contain carriers with which AT&T Mobility previously had direct interconnection in California but no longer has such interconnection.

REQUEST 1-2:

Please provide a list of all VOIP service providers that are not included in Your response to REQUEST 1-1 that You currently have or have had a direct connection with at any time since January 2012.

OBJECTIONS:

AT&T Mobility objects to this request on the grounds that the information requested (1) is overly broad and unduly burdensome, (2) is irrelevant to the instant dispute, (3) will not lead to the production of admissible evidence, and (4) is vague and ambiguous, particularly in that the term “VOIP service provider” is not defined, and also particularly in that the phrase “that you have or have had a direction connection with” is vague and ambiguous because it is unclear if this mean entities that AT&T Mobility has VOIP direct connections with, or entities that AT&T Mobility has direct connections with, regardless of mode, which entities also happen to provide VOIP.

Without waiving these objections, AT&T Mobility states that it will provide a response to this request.

RESPONSE:

Without waiving its objections, AT&T Mobility responds as follows: In the response to Request 1-1, AT&T Mobility will provide a complete list of telecommunications carriers with which it currently has direct interconnection in California -- when AT&T Mobility and O1 reach agreement on an appropriate Non-Disclosure Agreement. As per the objections above, AT&T Mobility cannot determine which, if any of these carriers, are “VoIP service providers” as that term is used in Request 1-2.

EXHIBIT 11

Anita Taff-Rice

From: Paul Walters <pwalters@sbcglobal.net>
Sent: Thursday, June 30, 2016 4:44 PM
To: anita@icommlaw.com
Cc: THOMSON, MARGARET M (Legal); MILLER, DAVID J (Legal); Michel Nelson
Subject: Re: Fwd: RE: FW: C15-12-020

Anita: The proposed expedited schedule is acceptable to AT&T.

Paul Walters, Jr.
17 E. 1st St.
Edmond, OK 73034
405-359-1718 (Office)
405-388-4562 (Mobile)
pwalters@sbcglobal.net

From: Anita Taff-Rice <anita@icommlaw.com>
To: 'Paul Walters' <pwalters@sbcglobal.net>
Cc: "THOMSON, MARGARET M (Legal)" <mt4348@att.com>; "MILLER, DAVID J (Legal)" <dm9282@att.com>; Michel Nelson <mnelson@o1.com>
Sent: Thursday, June 30, 2016 6:21 PM
Subject: Fwd: RE: FW: C15-12-020

Paul,
Per Judge Kelly's instructions below, I am writing to propose an expedited schedule for the motion to compel. O1 will file the motion to compel on July 5 and we are requesting a response from AT&T Mobility on July 11. That will provide Judge Kelly with three business days to issue a ruling prior to the reply testimony deadline.
Please let me know if this is acceptable.
Thanks, Anita

----- Forwarded Message -----

Subject: RE: FW: C15-12-020

Date: Thu, 30 Jun 2016 22:53:53 +0000

From: Kelly, Gerald F. <Gerald.Kelly@cpuc.ca.gov>

To: 'anita@icommlaw.com' <anita@icommlaw.com>, margaret.m.thomson@att.com <margaret.m.thomson@att.com>, inna@icommlaw.com <inna@icommlaw.com>, JMertz@o1.com <JMertz@o1.com>, jr2762@att.com <jr2762@att.com>, eb1642@att.com <eb1642@att.com>, marg@tobiaslo.com <marg@tobiaslo.com>, eh2726@att.com <eh2726@att.com>, thomas.selhorst@att.com <thomas.selhorst@att.com>, MNelson@o1.com <MNelson@o1.com>, THOMSON, MARGARET M (Legal) <mt4348@att.com>

Ms. Taff-Rice,

Thank you for the information. I will respond as follows. I agree your question is procedural and does not require an *ex parte* notice. As it relates to the potential discovery dispute I strongly encourage the parties to work this out. However, if a motion is necessary, you will need to file it as soon as possible and AT&T Mobility will need to respond to it as quickly as possible. Perhaps the parties can agree to a shortened period of time for AT&T Mobility to respond to your proposed motion. As you are aware next week contains a holiday and I am in hearings for two days. I will advise the parties that hearings will not be continued. Depending on the complexity of the motion and the AT&T Mobility's response it will take several days for a ruling.

Thank you,

ALJ Kelly

From: Anita Taff-Rice [mailto:anita@icommlaw.com]

Sent: Thursday, June 30, 2016 3:40 PM

To: Kelly, Gerald F.; margaret.m.thomson@att.com; anita@icommlaw.com; inna@icommlaw.com; JMertz@o1.com; jr2762@att.com; eb1642@att.com; marg@tobiaslo.com; eh2726@att.com; thomas.selhorst@att.com; MNelson@o1.com; Kelly, Gerald F.; THOMSON, MARGARET M (Legal)

Subject: Re: FW: C15-12-020

Judge Kelly,

Thank you for the conference calling information for our status conference.

I wanted to let you know that O1 will be filing a motion to compel after Opening Testimony is submitted tomorrow because O1 and AT&T Mobility have reached an impasse over production of certain documents that O1 believes are integral to its case. O1 has diligently attempted to resolve this matter through two telephonic meet and confers and multiple emails beginning on June 16. AT 3:20 today, AT&T Mobility indicated that it will continue to withhold the documents.

Given this situation, and the rapidly approaching reply testimony deadline and hearing dates, O1 thought it was prudent to notify Your Honor about this discovery dispute, so that we could get any specific guidance you may have regarding the timing and consideration of a motion to compel. I have copied the entire service list on this email, which O1 believes addresses only a procedural matter, and therefore no *ex parte* notice is required. We would be happy to file an *ex parte* notice if Your Honor feels one is needed.

Thank you,

Anita

On 6/30/2016 3:08 PM, Kelly, Gerald F. wrote:

Ms. Thomson and Ms. Taff-Rice,

Below you will find the call-in number for the status update conference call, which is scheduled for July 25, 2016 at 10:00 AM in the matter of C.15-12-020.

USA Toll Free Number: **877-937-0696**

Participant PASSCODE: **7032008**

Leader PASSCODE: **6960739**